

Inspection Report

Site: Arsenal Business Center
2275 Bridge Street
Philadelphia, PA 19137

Inspection date: December 9, 2010

EPA Region 3 Inspector:

Stephen Forostiak, Lead

Philadelphia Department Of Public Health/Air Management Services (AMS)

Jeff Forester, Acting Asbestos program Manager

Ed Skirkie, Air Pollution Control Inspector

Andrew Jones, Air Pollution Control Inspector


Summary

On December 9, 2010 at approximately 9:50 a.m., I arrived on site with Mr. Jeff Forester, Mr. Ed Skirkie, and Mr. Andrew Jones. We were allowed through the gated entrance to the main office. We entered the office area and introduced ourselves and I displayed my credentials to the secretary who then made calls. We were met by Mr. John Swanson, President of Commercial Real Estate Associates, and Ms. Brooke Weese, In-House counsel with New Huntingdon Construction Company, Inc. I displayed my credential to both Ms. Weese and Mr. Swanson and explained the purpose of my inspection. Both Ms. Weese and Mr. Swanson escorted us during the inspection; however they were not familiar with locations of particular buildings that I requested to see. Mr. Forester, Mr. Skirkie, and Mr. Jones seemed to be familiar with the building locations. We entered the fenced construction site and provided our names to a guard. We walked over to a concrete pad which was next to building number 218. Piles of

debris consisted mostly of bricks and were located around the perimeter of the pad. We walked on the pad and did not observe suspect asbestos debris. We then went to buildings ~~230 and 231~~ which were actually connected. These buildings were posted by the city as contaminated and restricted entry due to asbestos contamination. Once in our personal protection equipment (PPE) the AMS inspectors, Mr. Swanson, and I enter buildings number 230 and 231. Once in the basement I observed a corridor with bare piping and suspected asbestos debris on the floor beneath. I collected three samples and took photos of the pipe corridor which was littered with beer cans just after the first turn to the left (see photos 1 thru 8). Next we entered building ~~number 235~~ after putting our PPE on since this building was also posted as restricted entry by AMS. About 8 drums were present on the ground floor and suspected asbestos debris appeared to be littered all over the top of some of the drums that were stored together (see photo 10). Suspect asbestos debris was observed on top of an electrical conduit pipe on the wall near the 6 drums (see photo 15). Samples were collected of this debris. We walked up to the upper two floors and observed only a bit of suspect asbestos debris still clinging to the pipe which was about 10 feet from the floor. Just before we exited this building Mr. Jones pointed to a latter that led to another pipe corridor. He said there was more asbestos piping down in this area, but the area was partially filled with water. I climbed down the latter and was able to take photos of the pipe riser that had suspect asbestos debris clinging to it (see photo 17, 20) while the corridor continued some insulation could be seen under water and further down on the pipe (see photo 18, 19). Next we walked on top of a cement slab that the AMS inspectors said had been building ~~30's~~ location. There were several holes approximately 2 foot by 2 foot that led to the basement. Mr. Jones said he had climbed down one of these hole and documented asbestos-containing pipe

insulation in this area, however due to the lack of ladder or steps I did not attempt to enter this area. AMS added that the permit application their office received for this project stated the project was only going down to the slabs and the basement would not be part of the demolition. While walking off the slab we passed by a large machine being used to load debris in dumpsters. ~~I observed two areas on the building 58 slab that had rebar in.~~ The rebar from the concrete slab was visible. We next went to building number 51 and 52, but according to Mr. Forester these buildings were not posted by AMS as restricted. All of us entered building number ~~61/52~~ and observed more suspect insulation in a pipe chase located in the basement. I collected a sample (see photos 21 thru 26). Building number ~~123~~ was the next building that was entered. Mr. Forester said AMS did not observe asbestos material on the upper floors of ~~building 123~~ only in the basement. Only Mr. Forester, Mr. Swanson and I entered this basement. The basement was separated by a concrete wall and only accessible from two entrances outside. Two clear bags with asbestos danger labels were observed in one of the basements (see photos 28 thru 30). Both ~~bags were not sealed and contain pipe insulation debris.~~ One side of the basement was littered with pipe insulation debris (see photos 32 to 35, 38, & 39). Samples were collected from this area. The next building entered was number ~~37~~ and an AMS warning sign was posted. Only Mr. Forester, Mr. Swanson, and I entered this building in our PPE. We entered the basement and observed suspect asbestos pipe insulation and an insulated tank. There was another pipe chase observed in this building. Black bags with asbestos danger labels were observed in this building. Two bags had been cut off at the bottom while the top was duct taped closed. The other bags did not appear to contain suspect asbestos-containing material (see photos 41 to 47). We walked over to building 308 and observed the concrete pad for building 307. Piles of debris could be

seen along the perimeter of the pad. The debris appeared to consist mostly of red brick. Mr. Jones walked along the pad looking for suspect asbestos debris, but did not observe any. We continued to building 308 where, according to AMS, Delta/BJDS was performing an asbestos abatement removal. The AMS inspectors walked over to the asbestos work area entrance to speak to the supervisor for Delta. I spoke to the onsite asbestos monitoring person Mr. Richard Mason, Industrial Hygienist with Eagle Industrial Hygiene Associates, Inc. Mr. Mason said the entire building was considered the work area. Mr. Mason had not been on site for the beginning of the project and was only filling in for a few days. The insulated pipes were being wrapped in plastic and cut in section. The entire piping and insulation was being disposed of in this manner. We went back to the main office building where I provided a closing conference. I stated my concern that the demolition of these buildings may impact the suspect insulation observed in the pipe chases and in some of the basements. I listed our observation of the collapsing concrete pad for building number 58 as an example of potential fiber release problems that may occur if the asbestos material in the basements and pipe chases becomes damaged during the project. Ms. Weese requested a copy of the photos. I stated that I would provide Ms. Weese's information and request to EPA Region 3 counsel. Since there were no other questions we left the site.


Inspector
Stephen Forostiak- Enforcement Officer

12-14-2010
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Photo Identification Log Sheet

Date: December 9, 2010

Inspector/Photographer: Stephen Forostiak

Site Name & Arsenal Business Center

Address: 2275 Bridge Street

Philadelphia, PA 19137

Photo No.	Time	Description	Sample No.
1.		Building 230 & 231 basement Pipe chase corridor	
2.		Building 230 & 231 basement Debris in pipe chase corridor	
3.		Building 230 & 231 basement Sample of debris in pipe chase corridor	120910-SF-01
4.		Building 230 & 231 basement Debris in pipe chase corridor	
5.		Building 230 & 231 basement Sample of debris in pipe chase corridor	120910-SF-02
6.		Building 230 & 231 basement Debris in pipe chase corridor	
7.		Building 230 & 231 basement Sample of debris in pipe chase corridor	120910-SF-03
8.		Building 230 & 231 basement Pipe chase corridor to left of entry	
9.		Building 235 first floor Drum storage area	
10.		Building 235 first floor Suspect asbestos debris on drums	
11.		Building 235 first floor Drum top with suspect asbestos debris	
12.		Building 235 first floor Sample of debris on drum	120910-SF-04
13.		Building 235 first floor Drums top with suspect asbestos debris	
14.		Building 235 first floor Sample of debris on drum	120910-SF-05
15.		Building 235 first floor Suspect asbestos debris on electrical conduit	
16.		Building 235 first floor Sample of debris on electrical conduit	120910-SF-06
17.		Building 235 first floor Pipe risers leading to pipe chase	

Inspector Signature: 

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Photo No.	Time	Description	Sample No.
18.		Building 235 first floor Piece of pipe insulation under water	
19.		Building 235 Pipe chase under first floor	
20.		Building 235 first floor Close up of debris and pipe riser	
21.		Building 51/52 Basement Suspect asbestos debris at pipe chase entrance	
22.		Building 51/52 Basement Sample pipe chase entrance debris	120910-SF-07
23.		Building 51/52 Basement Pipe chase	
24.		Building 51/52 Basement Pipe chase	
25.		Building 51/52 Basement Pipe chase	
26.		Building 51/52 Basement Close up of damaged pipe insulation	
27.		Building 123 basement Small section of pipe insulation	
28.		Building 123 basement Bags with danger asbestos label	
29.		Building 123 basement Bag contents	
30.		Building 123 basement Bottom of second bag	
31.		Building 123 basement Entrance to other side of basement	
32.		Building 123 basement Debris	
33.		Building 123 basement Bare piping	
34.		Building 123 basement Suspect asbestos debris	

Inspector Signature: Stephen Forostiak

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Site Name & Arsenal Business Center

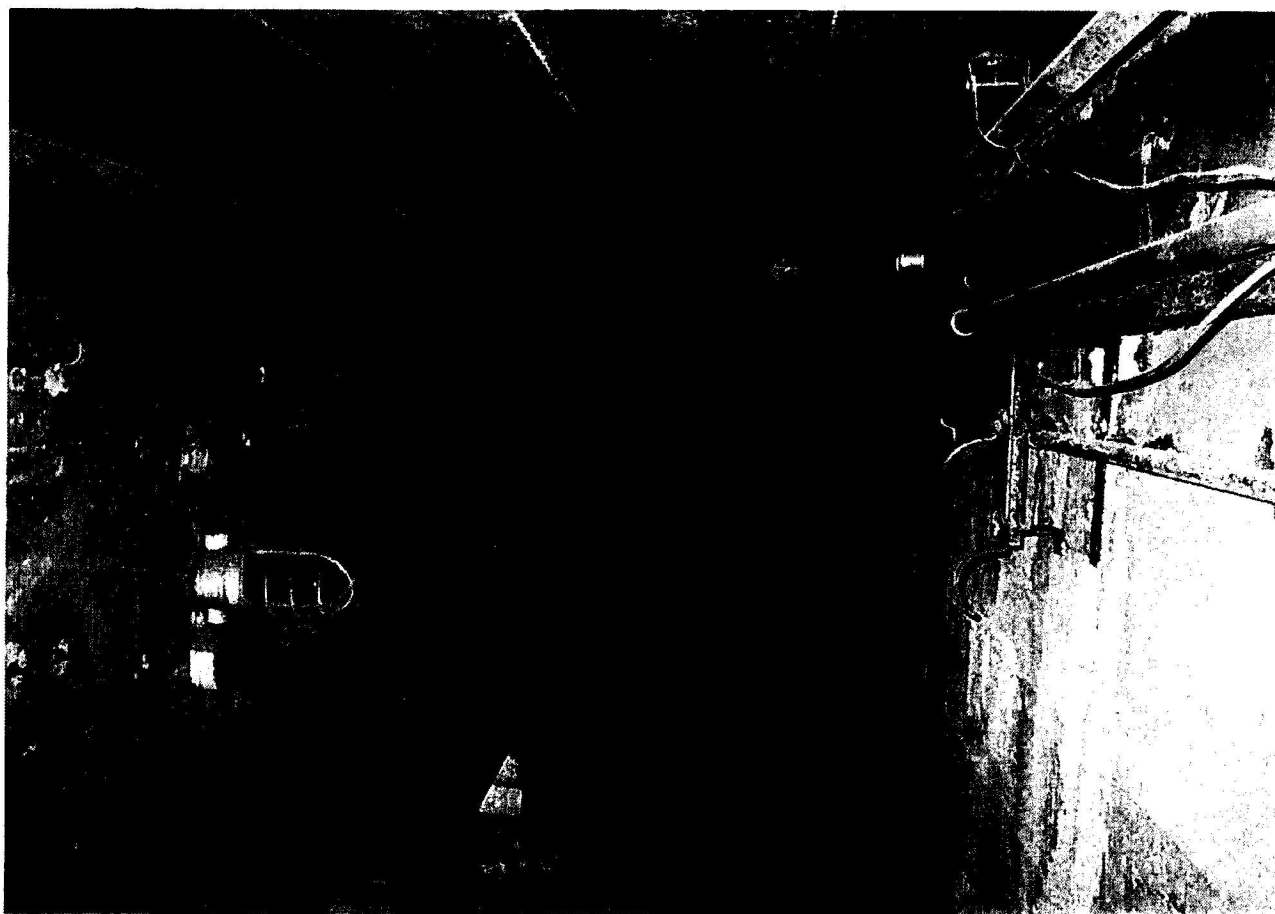
Address: 2275 Bridge Street
Philadelphia, PA 19137

Photo No.	Time	Description	Sample No.
35.		Building 123 basement Suspect asbestos debris	
36.		Building 123 basement Sample of suspect asbestos debris	120910-SF-08
37.		Building 123 basement Piping	
38.		Building 123 basement Suspect asbestos debris on wall	
39.		Building 123 basement Suspect asbestos debris	
40.		Building 123 basement Sample of suspect asbestos debris	120910-SF-09
41.		Building 57 basement Insulated tank with damage	
42.		Building 57 basement Piping	
43.		Building 57 basement Suspect asbestos debris	
44.		Building 57 basement Pipe chase entrance	
45.		Building 57 basement Plastic barrier in pipe chase	
46.		Building 57 basement Bags with danger asbestos labels	
47.		Building 57 basement Bags with danger asbestos labels	

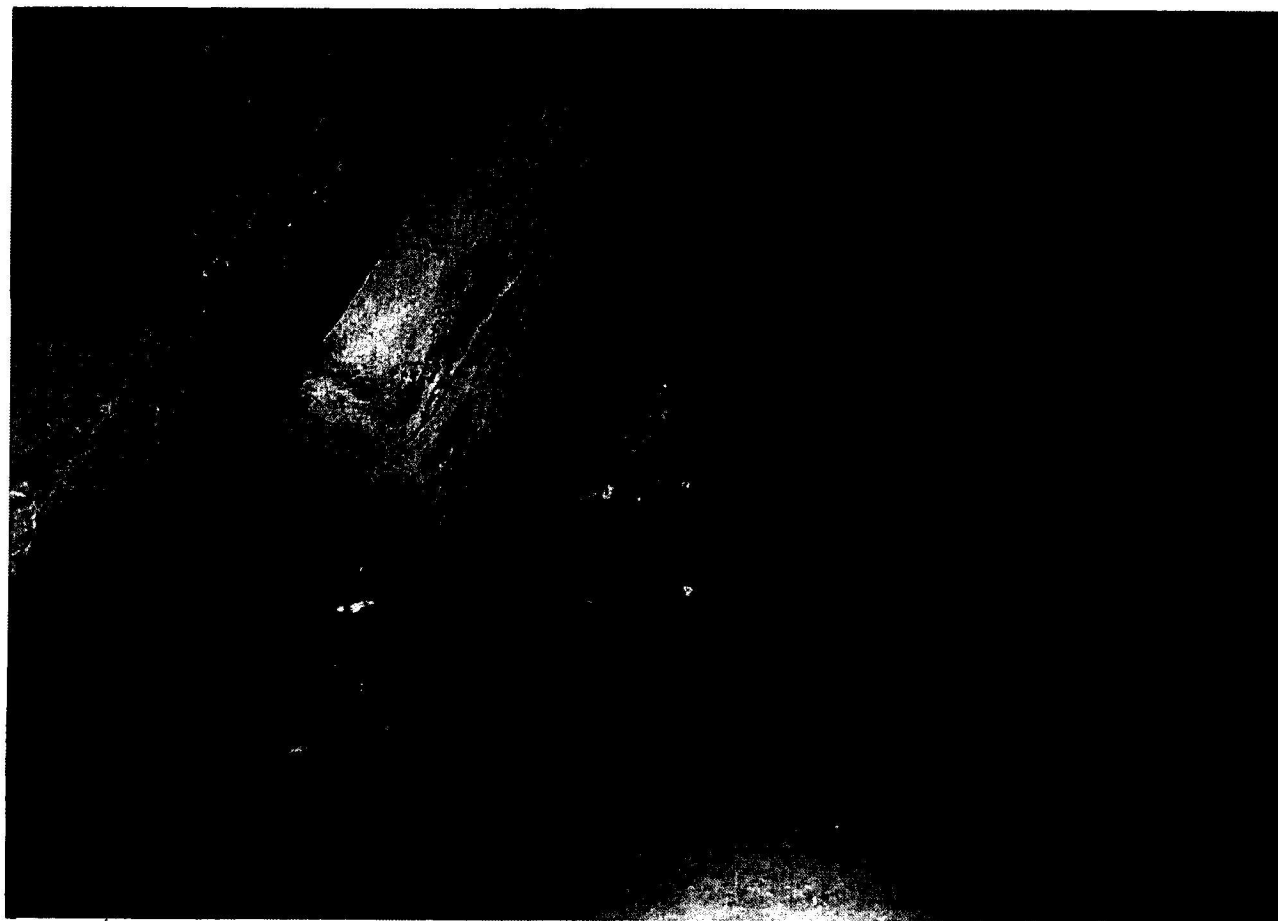
Inspector Signature: 

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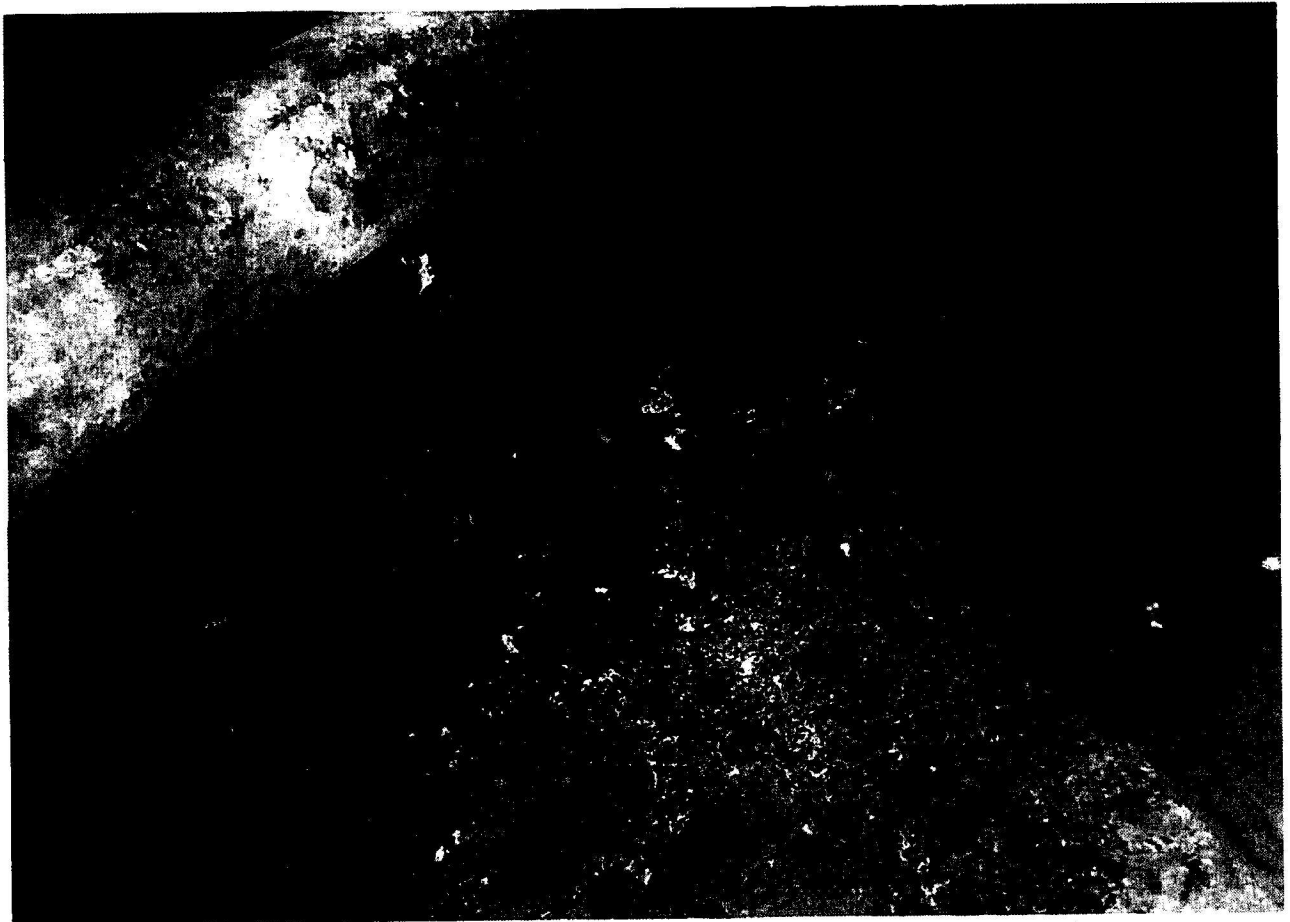
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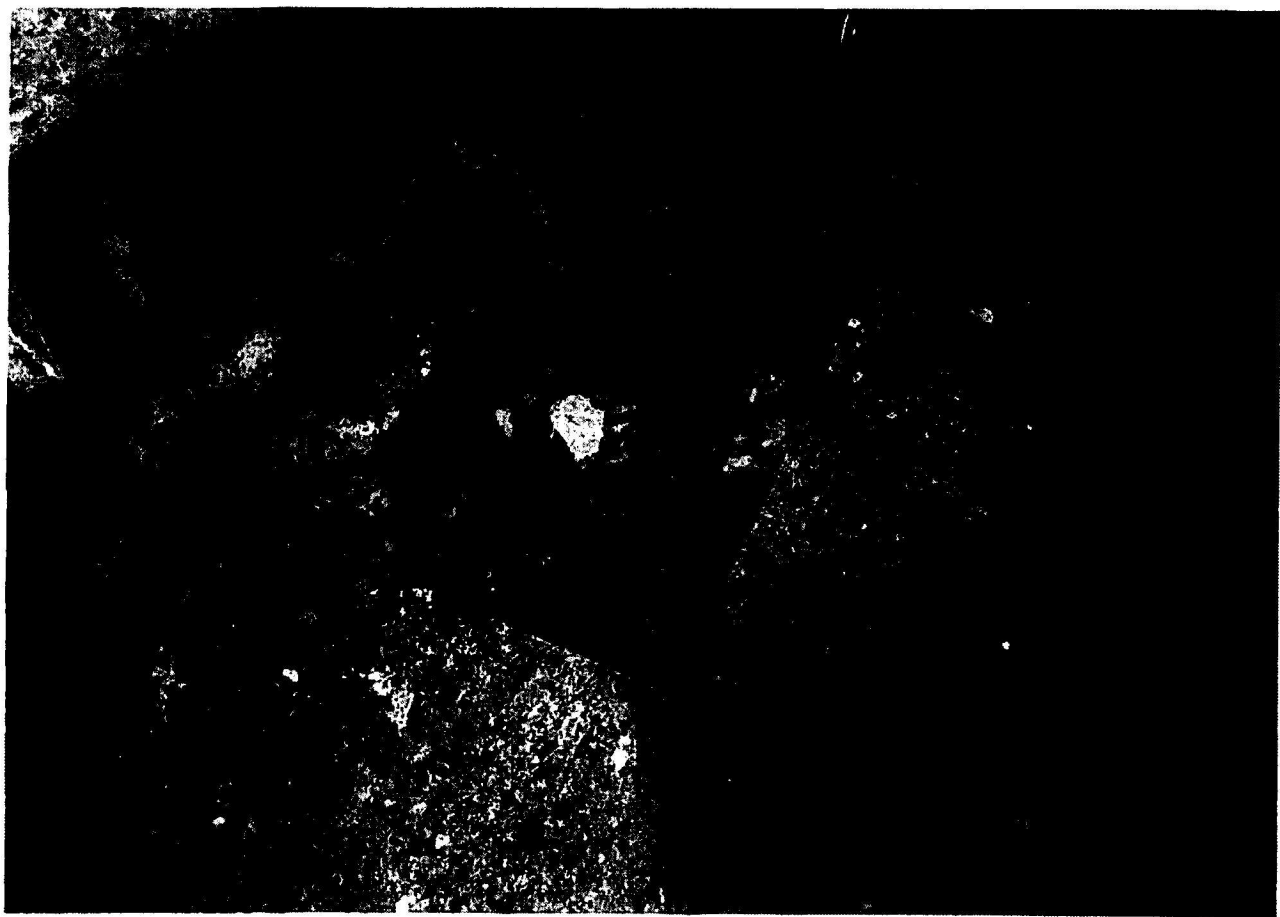
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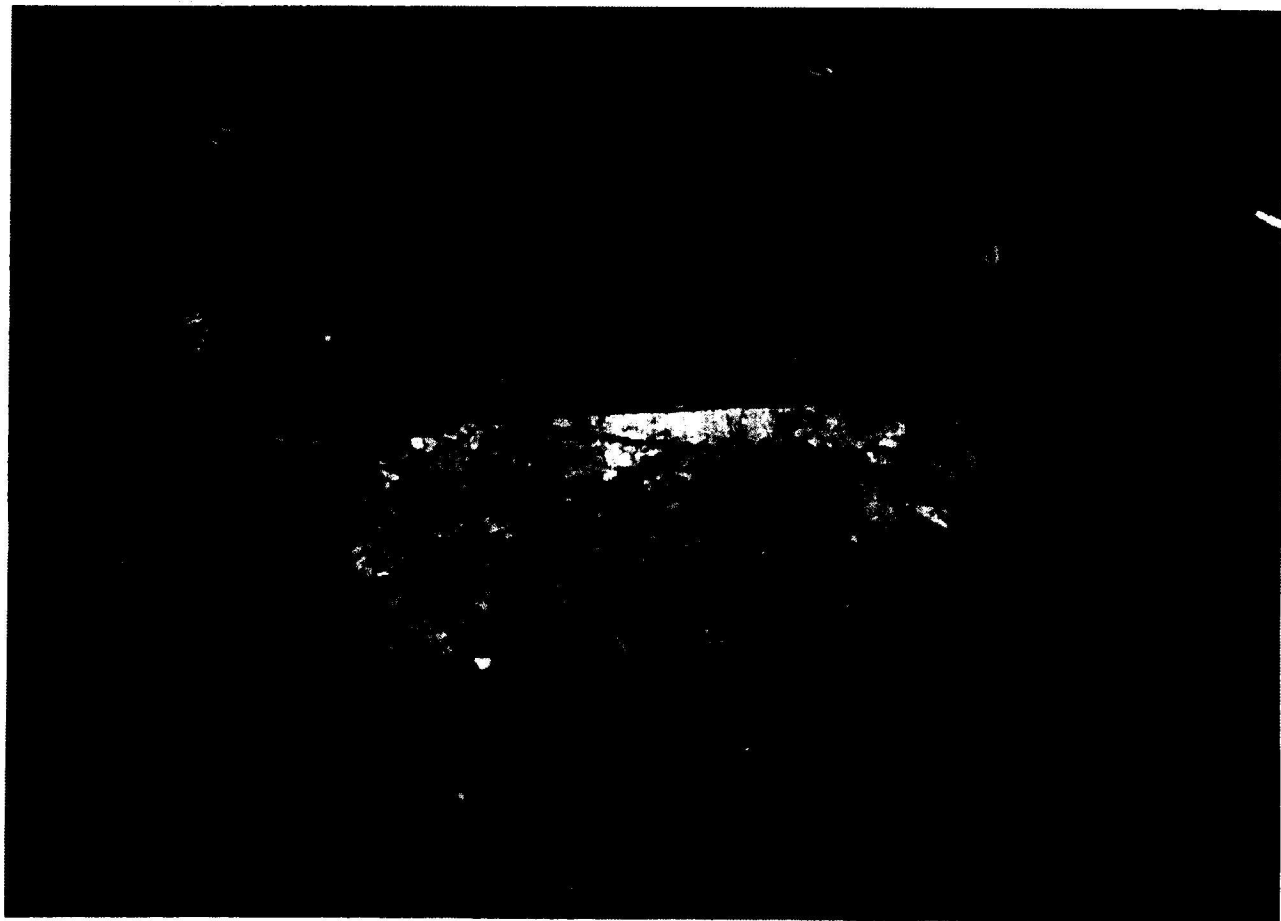
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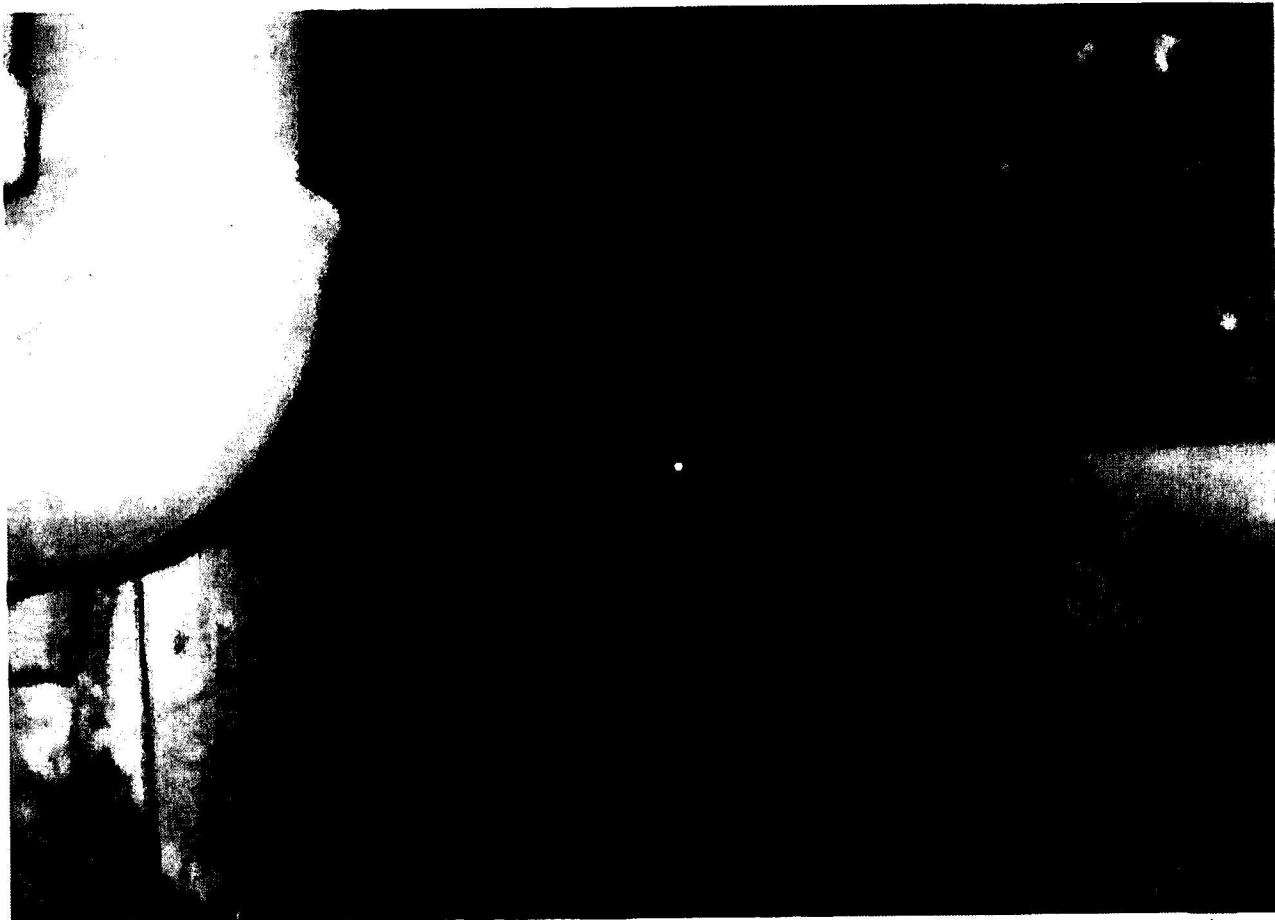
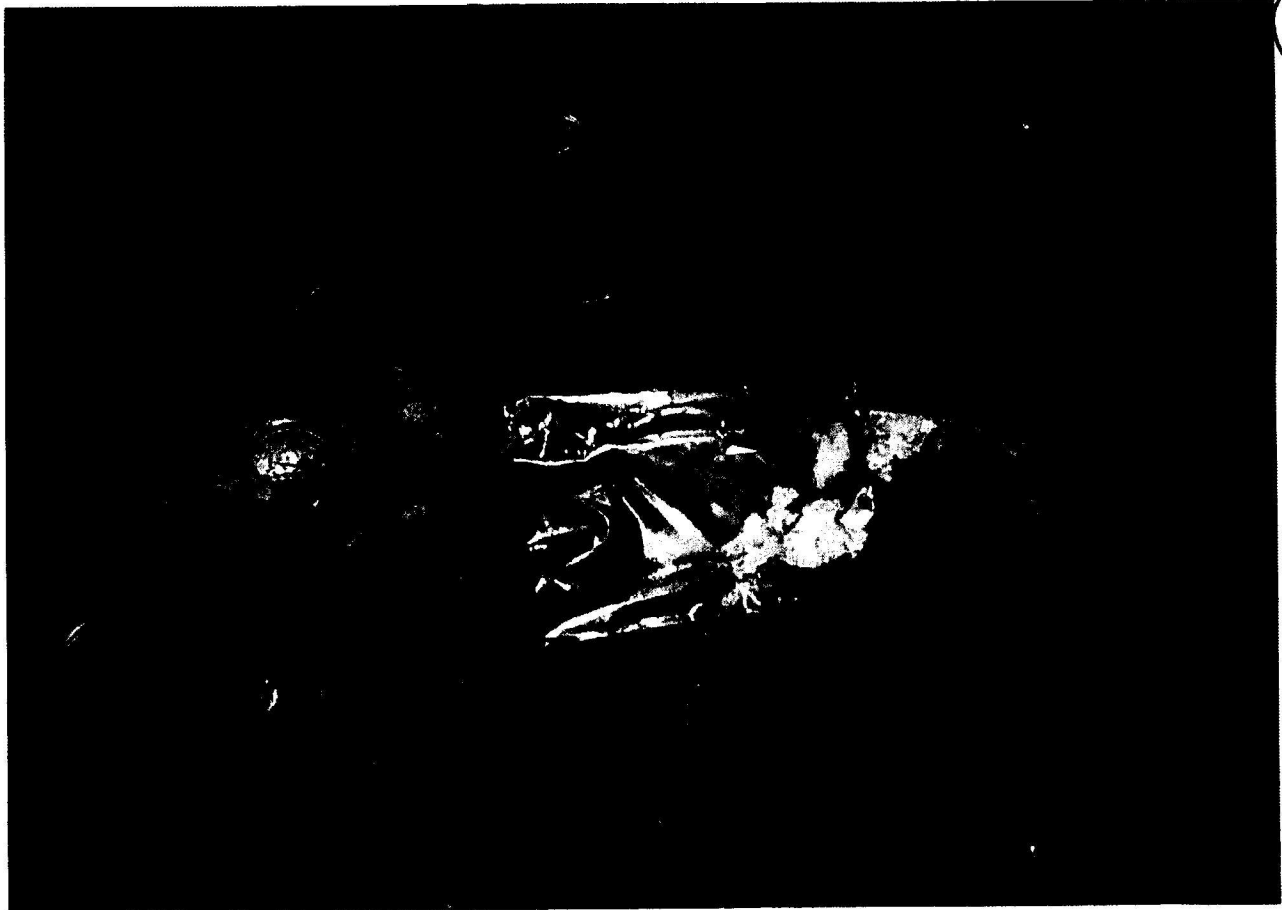
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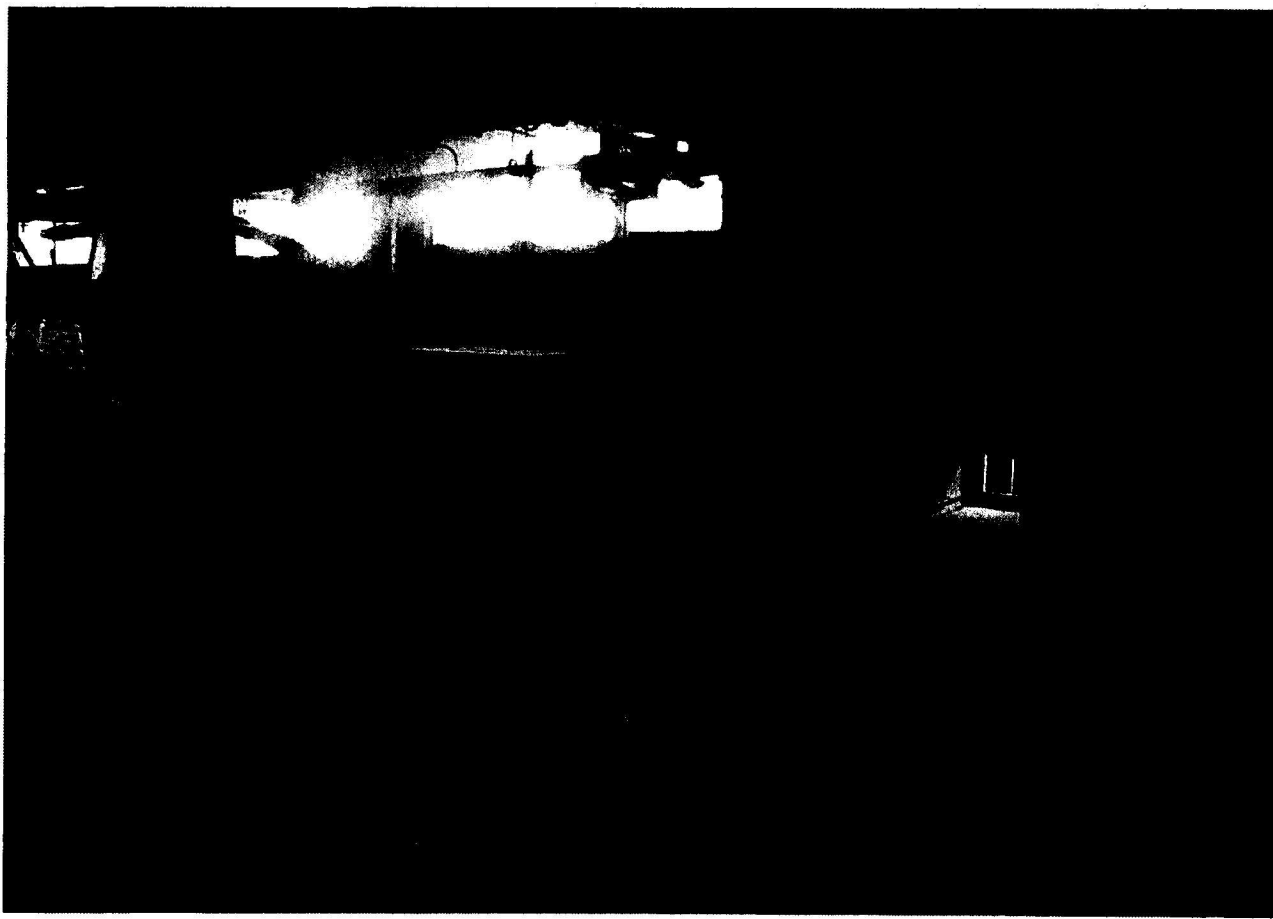


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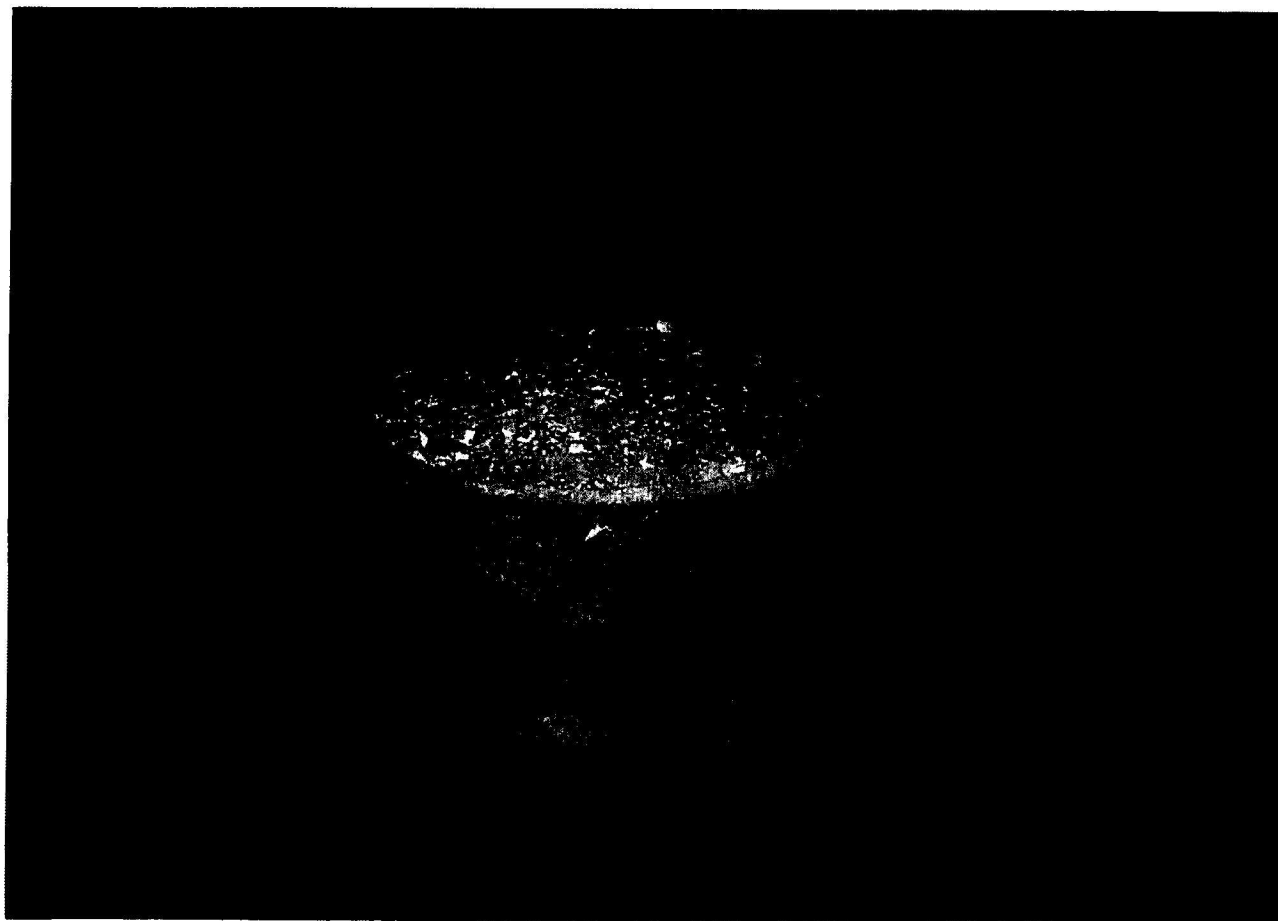


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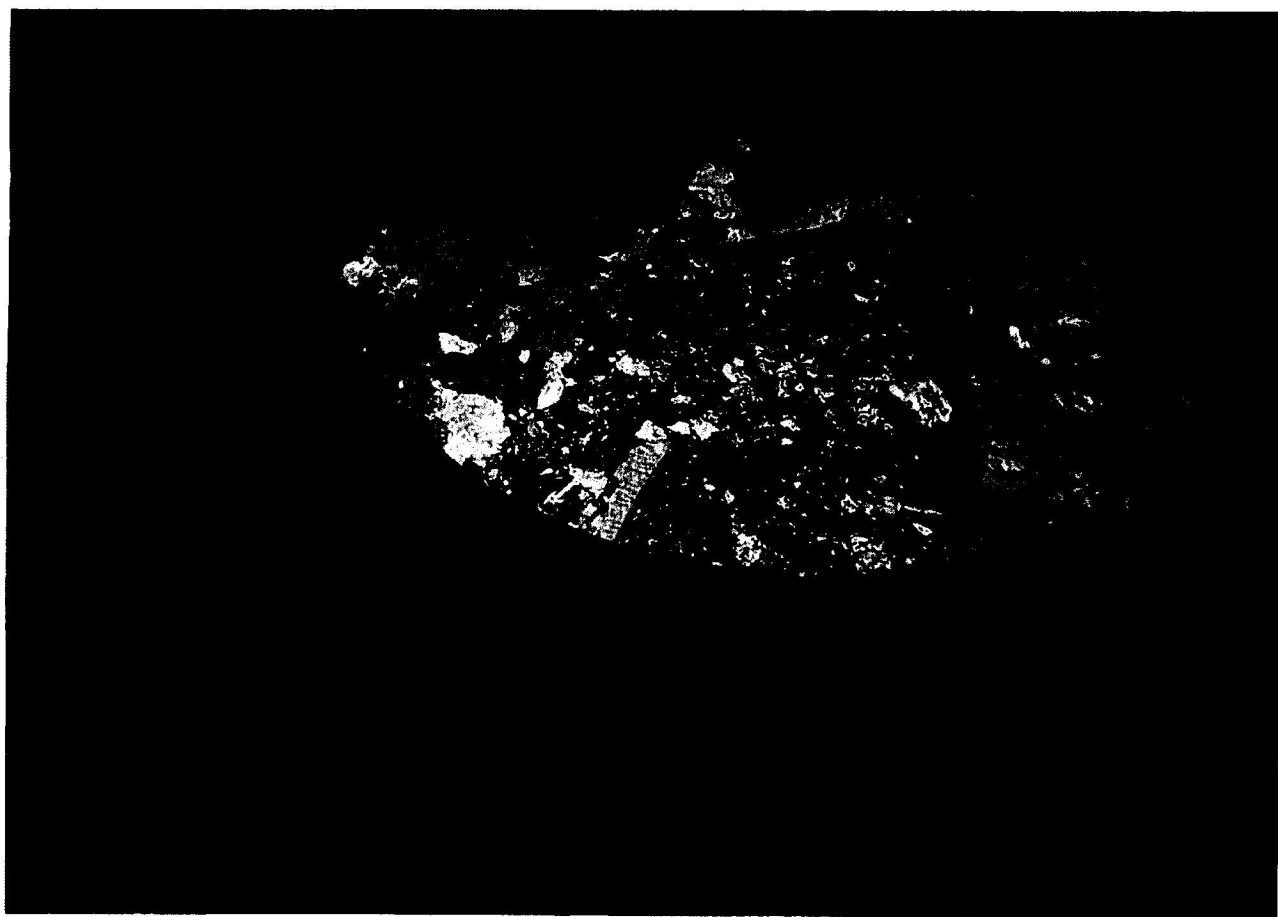


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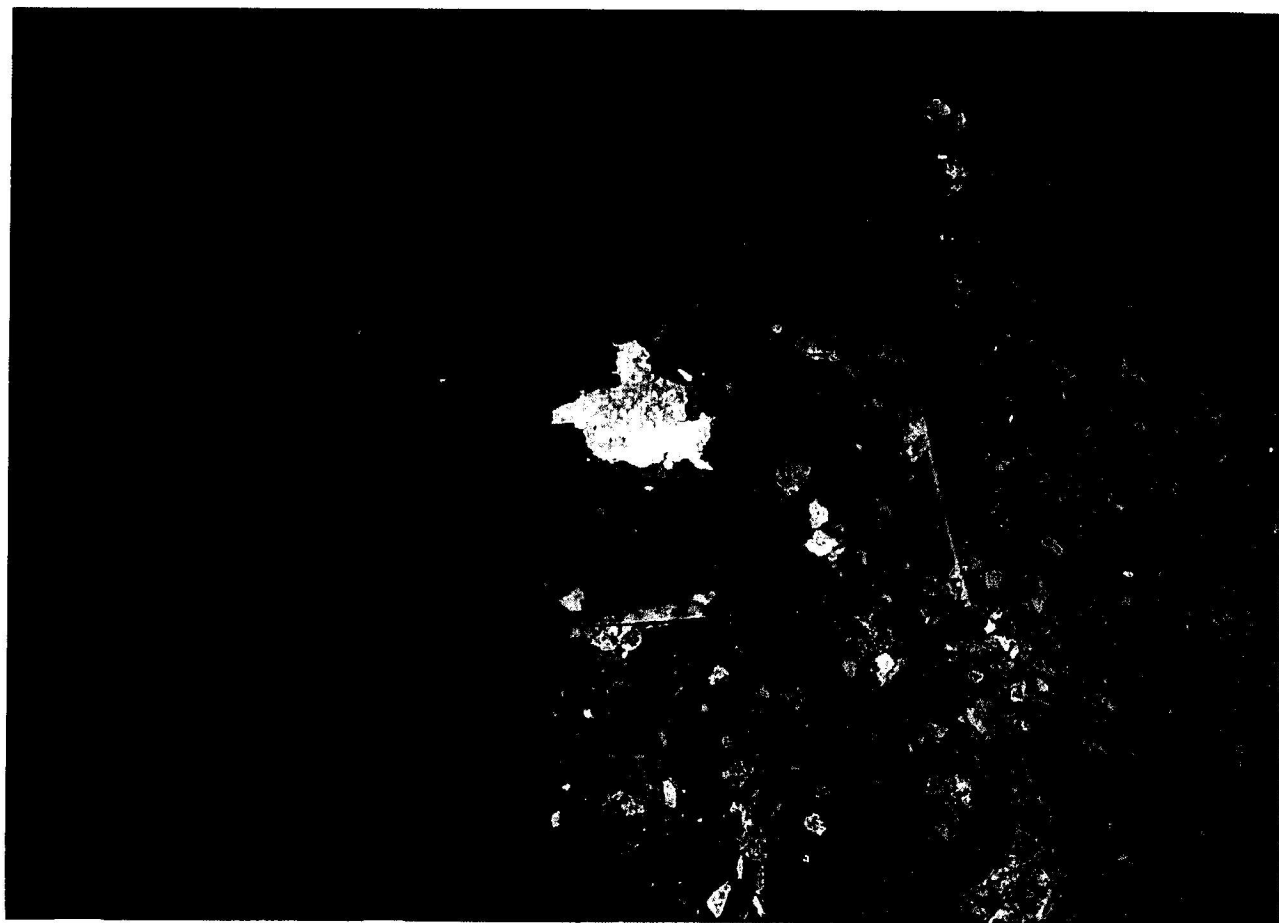


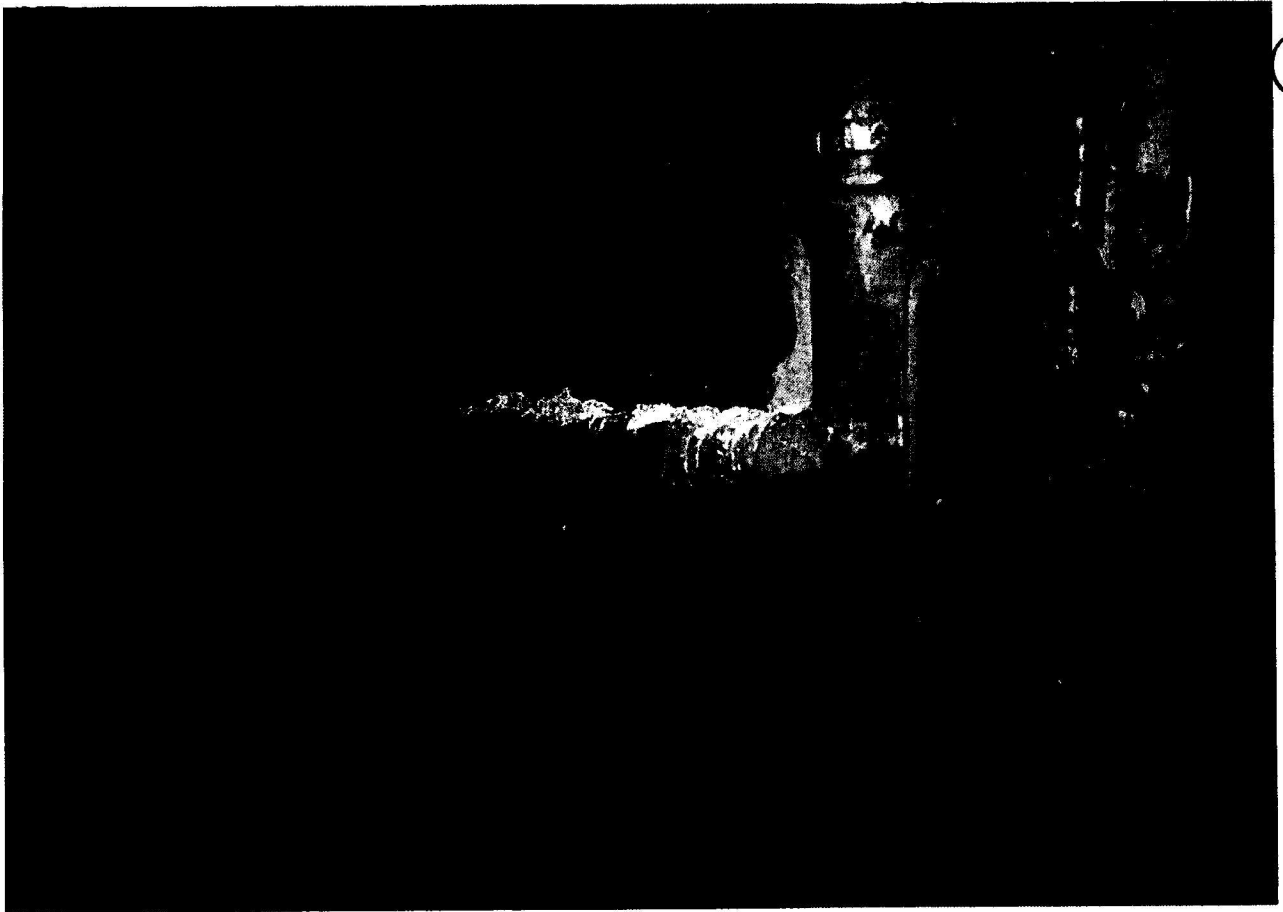
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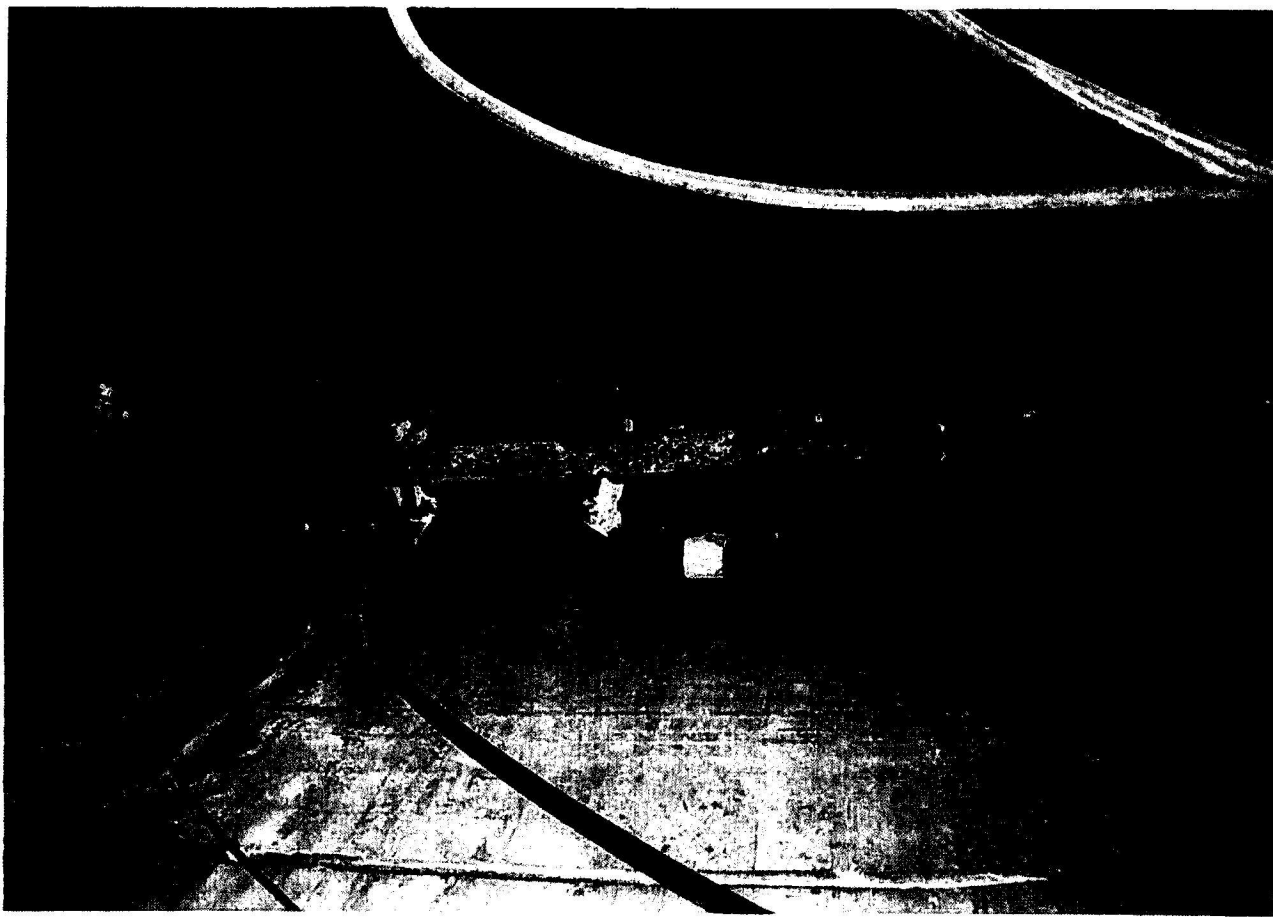




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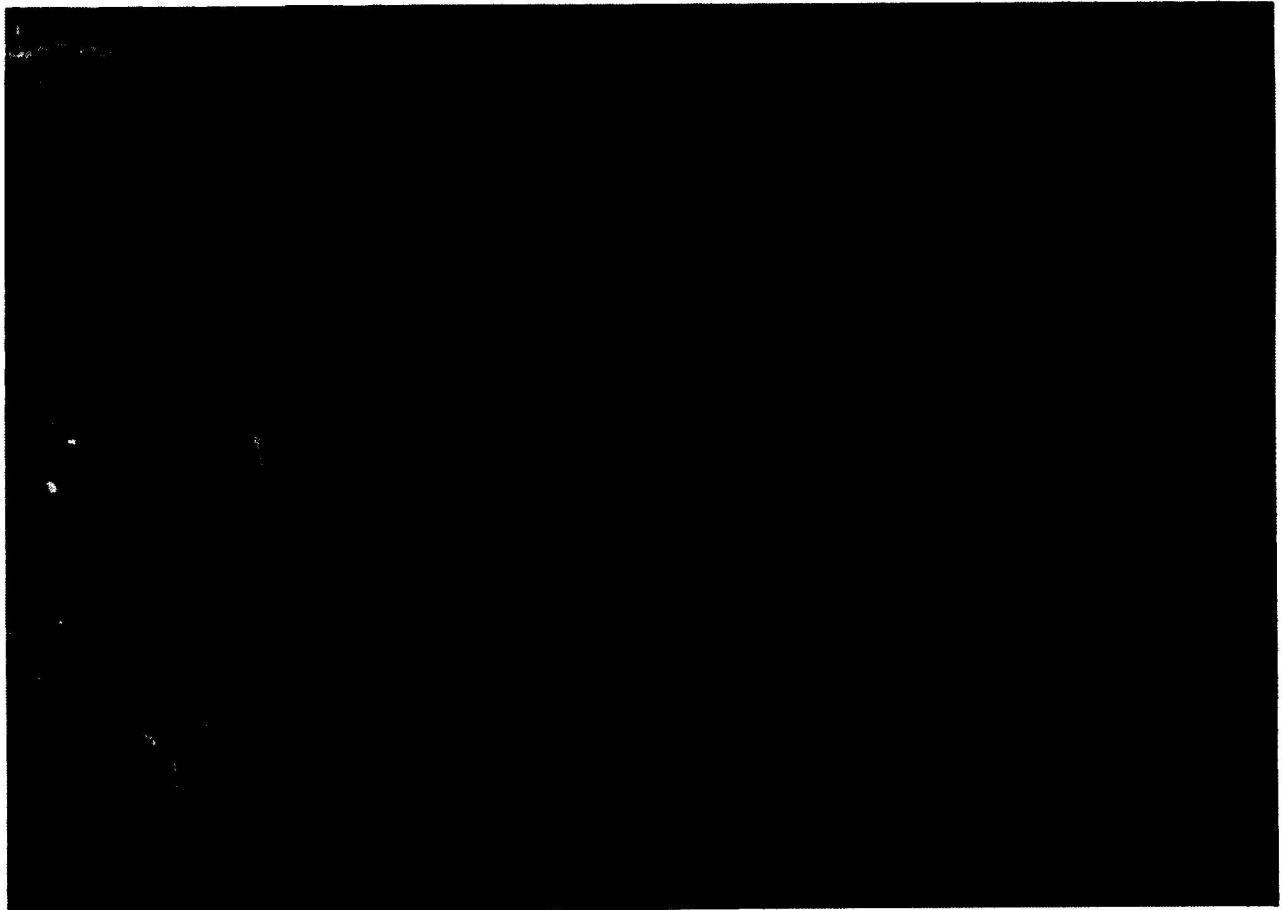
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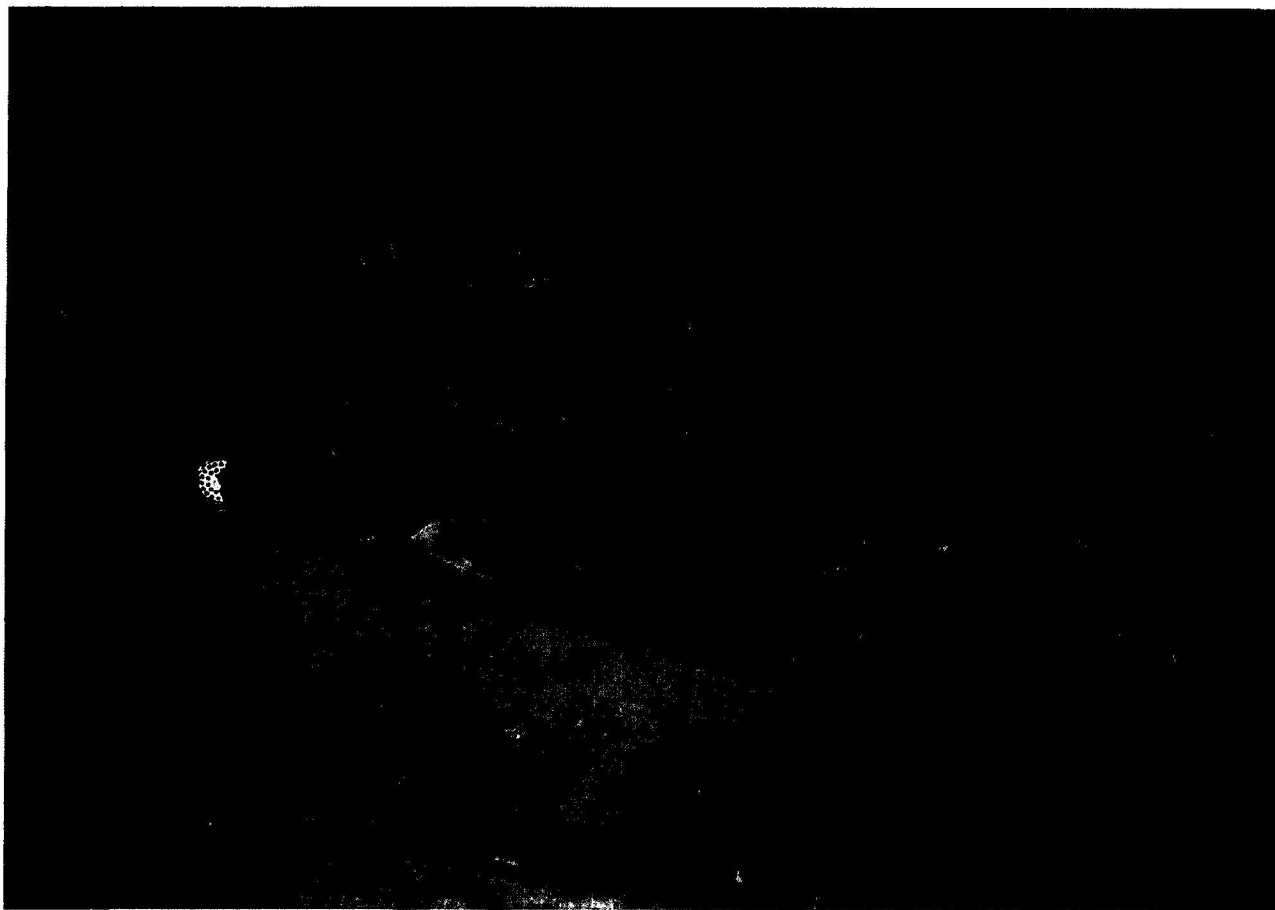
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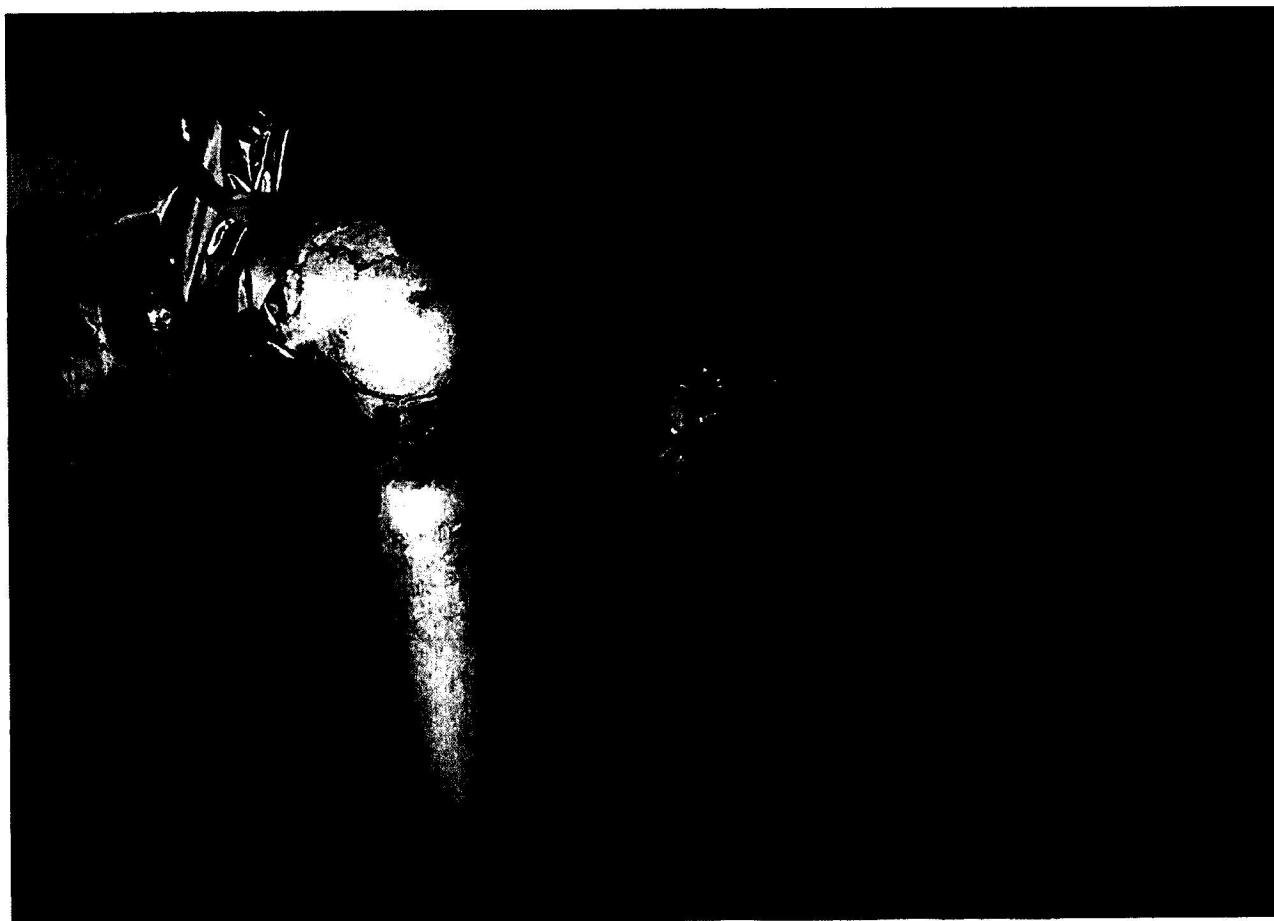


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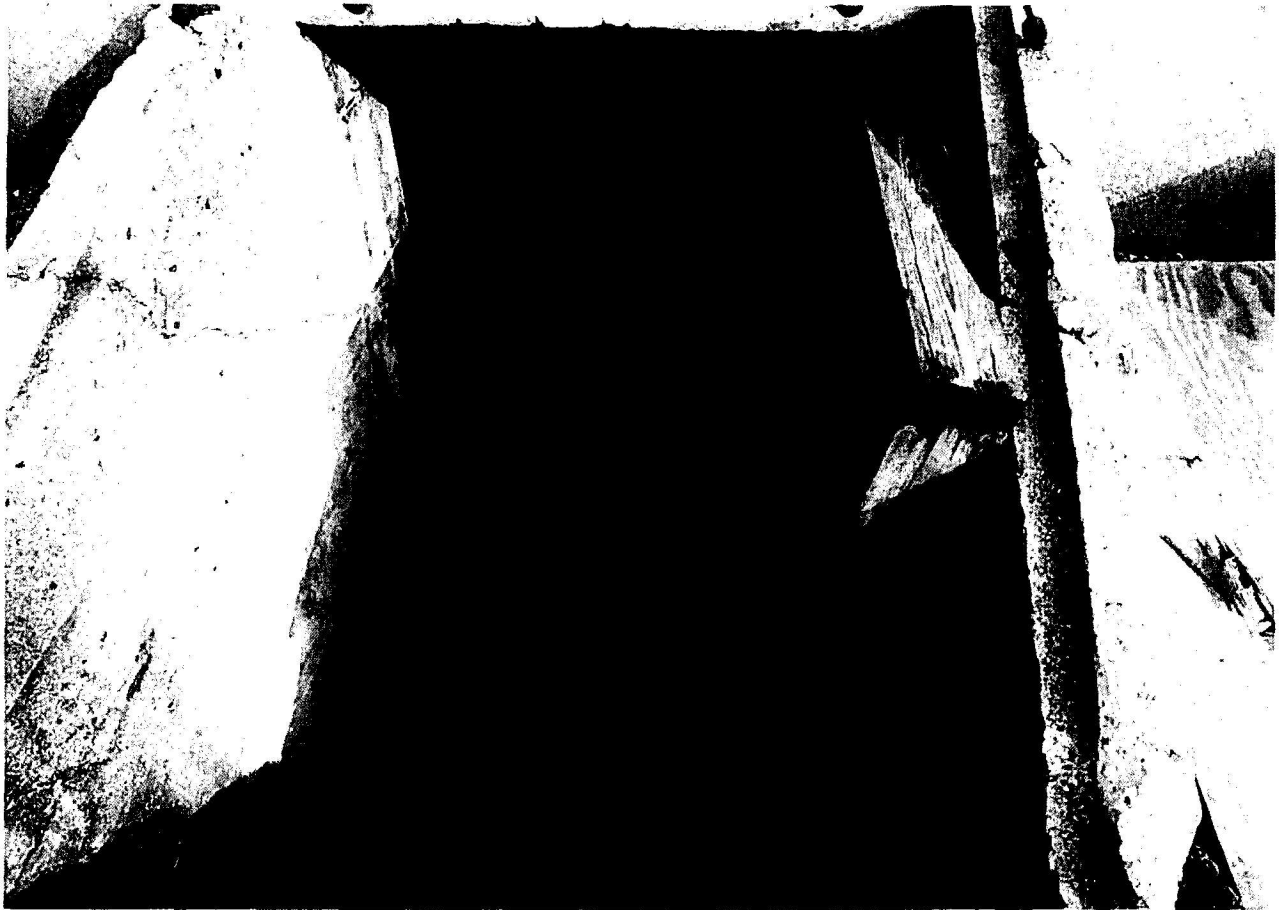
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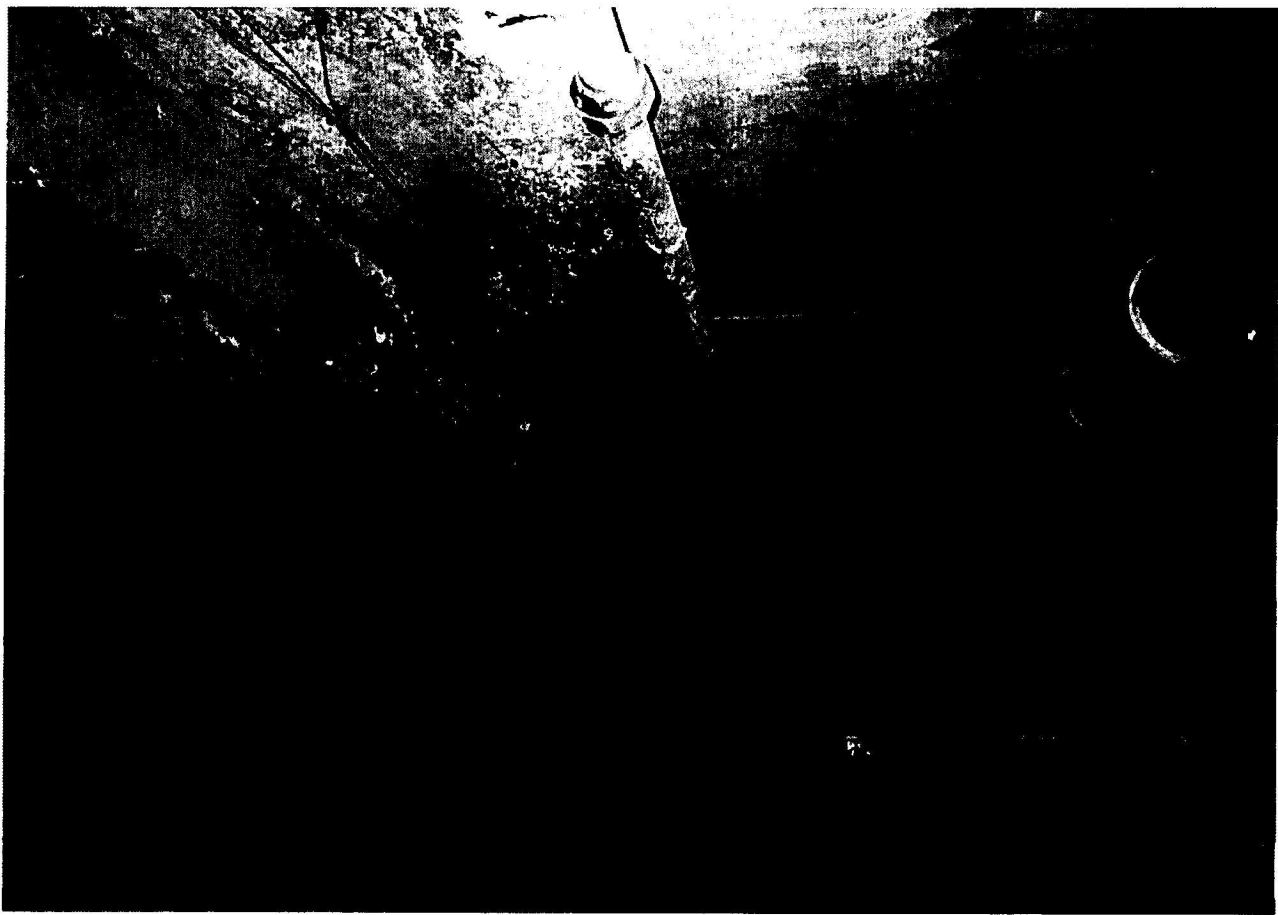
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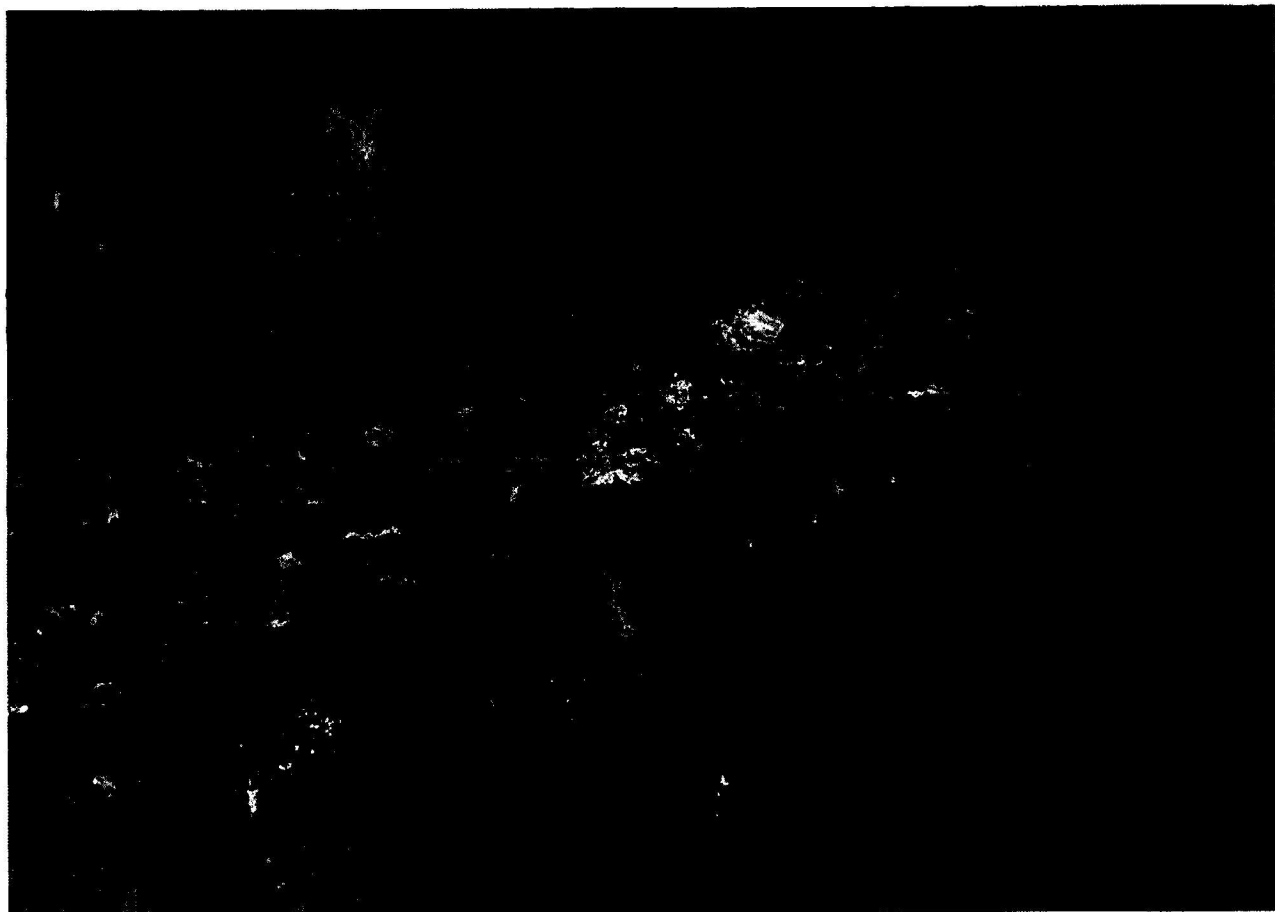


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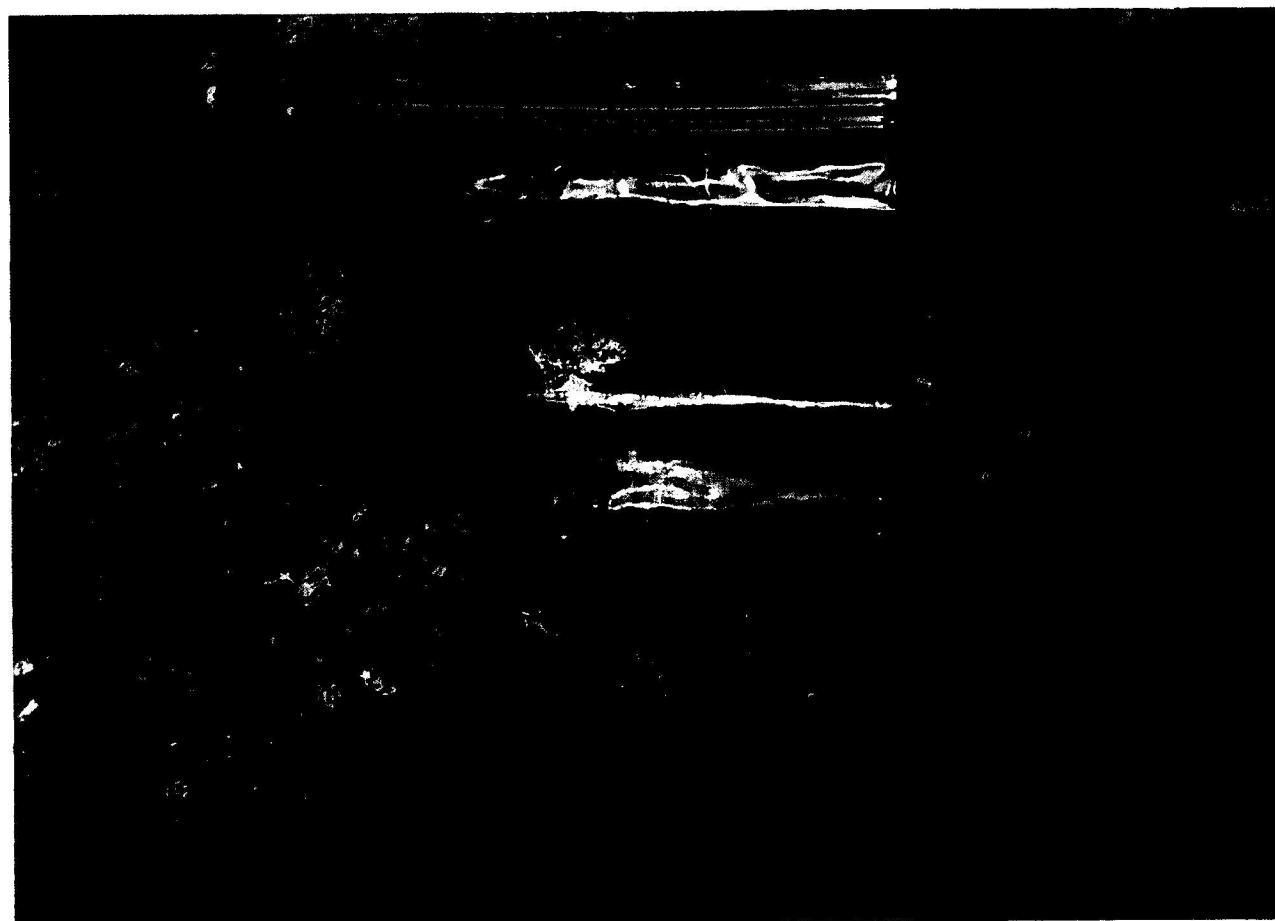
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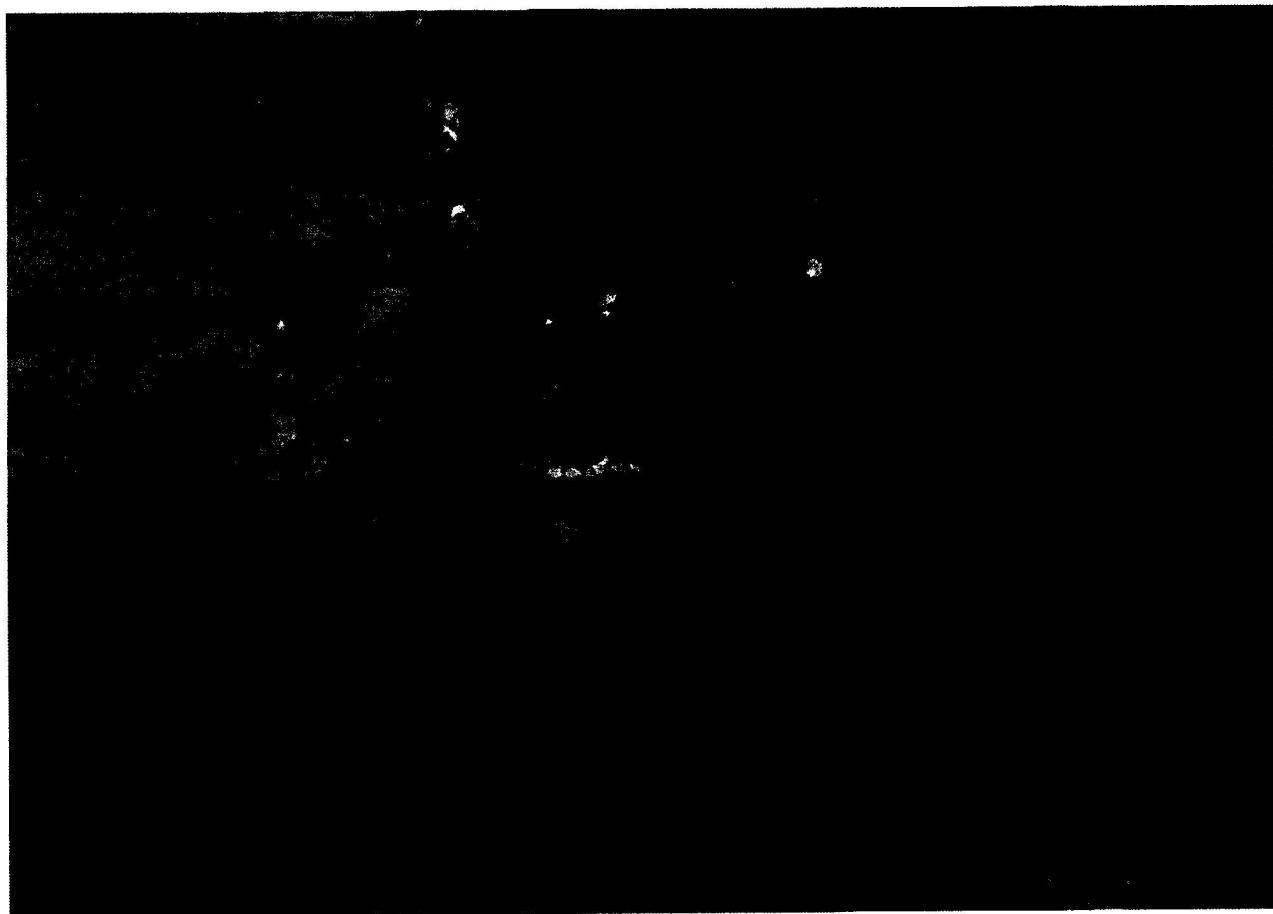
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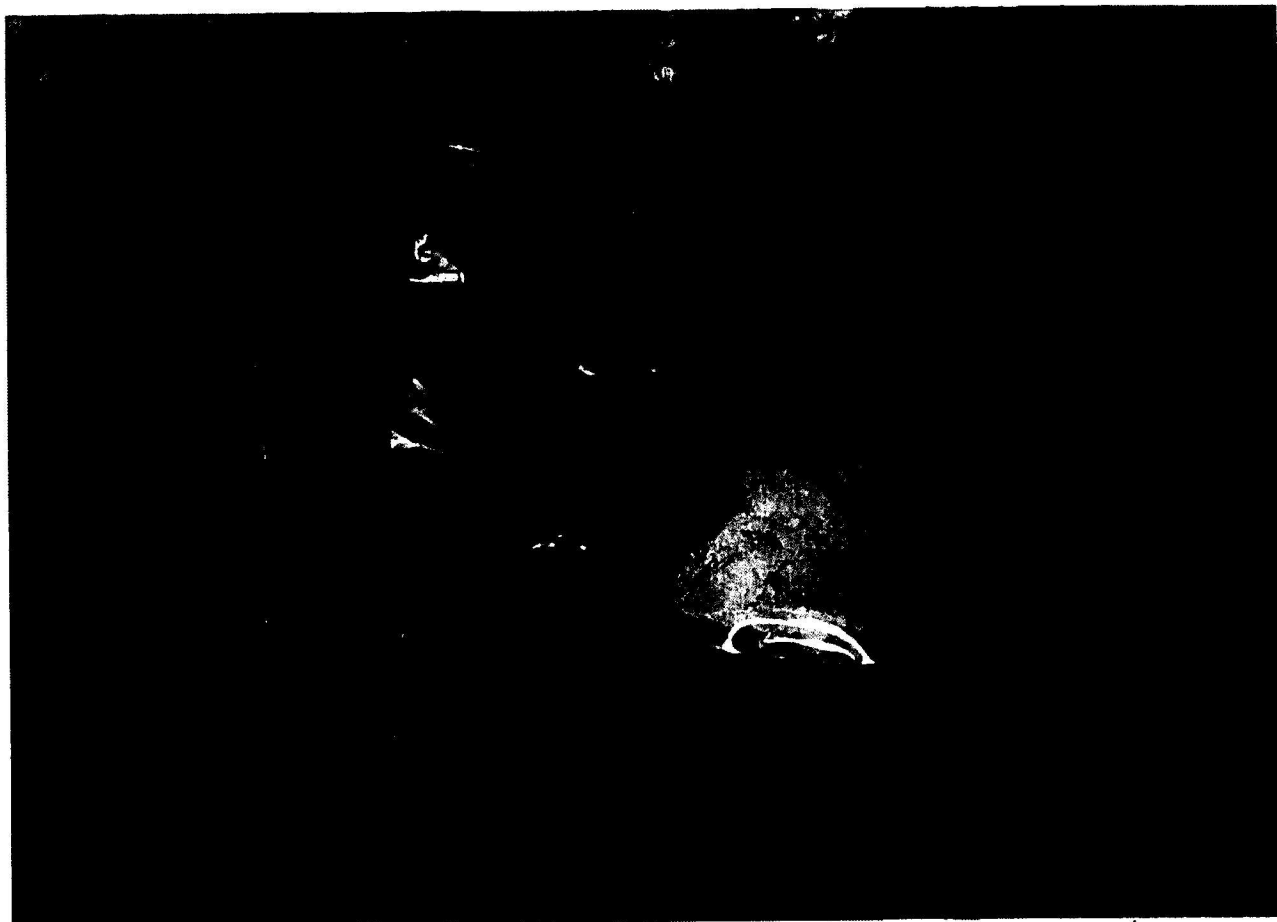
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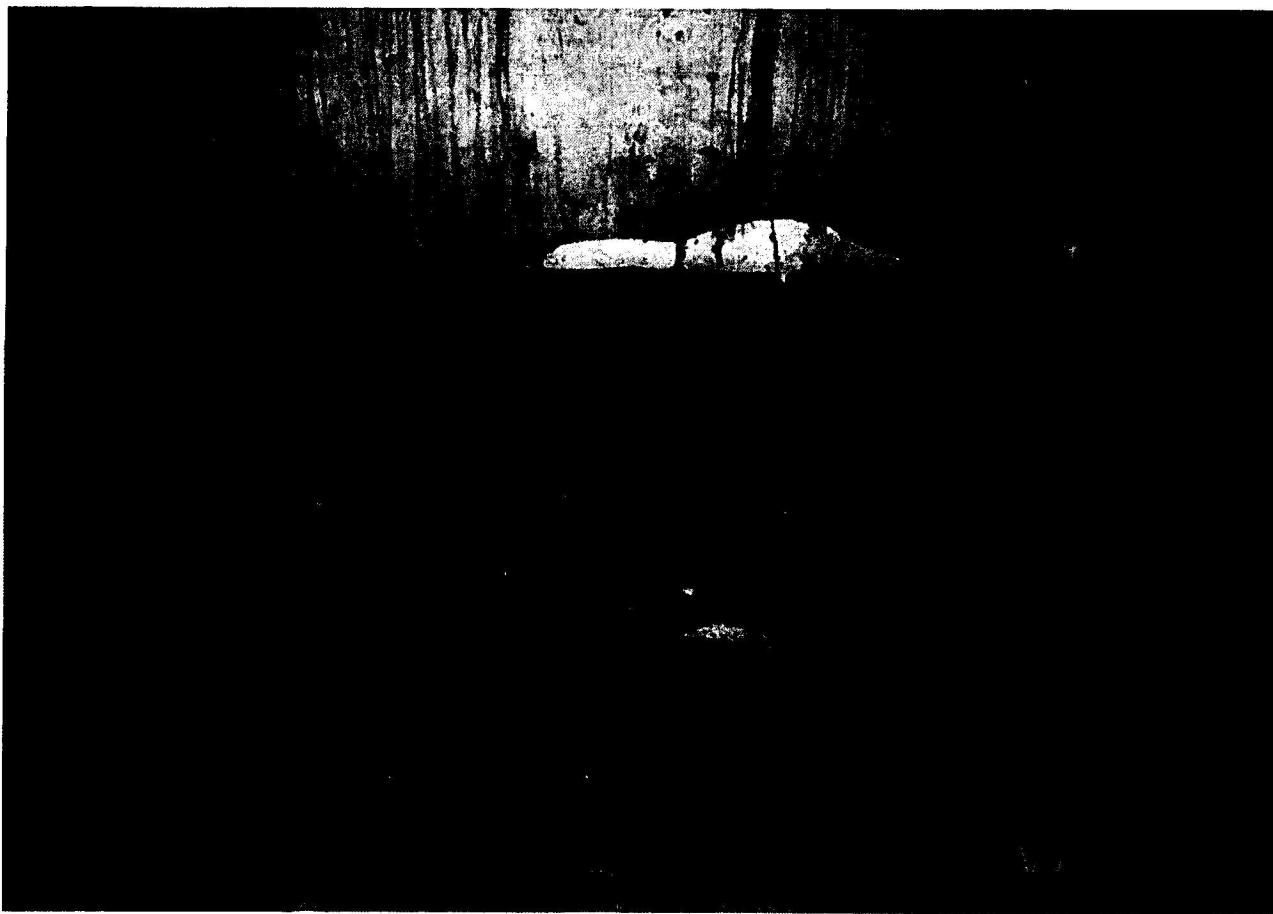
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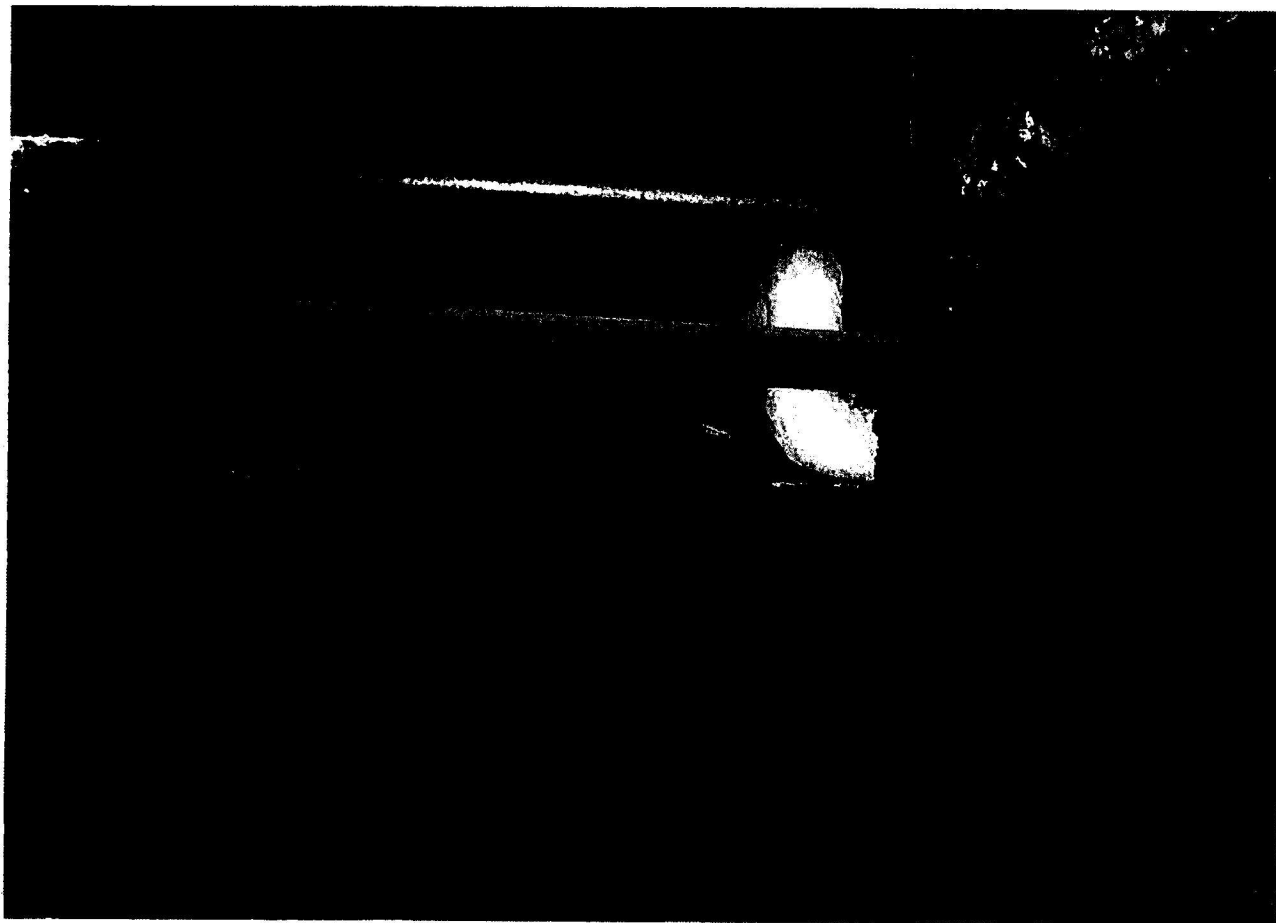
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SAMPLE COLLECTION LOG

Facility Name: Arsenal Business Center
Facility Address: 2275 Bridge Street
Philadelphia, PA 19137

Sampler(s): Stephen Forostiak
Stephan Forostiak
Date Sampled: 12-09-2010

SAMPLE NUMBER	SAMPLE LOCATION	SAMPLE DESCRIPTION	COMMENTS
120910-SF-01	Building 231 Basement Pipe Chase	Soft grey debris	
120910-SF-02	Building 231 Basement Pipe Chase	Soft white debris	
120910-SF-03	Building 231 Basement Pipe Chase	Soft white debris	
120910-SF-04	Building 235 First Floor From top of drum	Soft white and grey debris	
120910-SF-05	Building 235 First Floor From top of drum	Soft white debris	
120910-SF-06	Building 235 First Floor From top of electrical conduit pipe	Soft white debris	
120910-SF-07	Building 51452 Basement At entrance to pipe chase	Soft white debris	
120910-SF-08	Building 123 Basement	Soft white debris	
120910-SF-09	Building 123 Basement	Soft white debris	

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